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U.S. Department of Justice

United States Attorney Eastern District of New York

CP

F.#2010R00420

271 Cadman Plaza East Brooklyn, New York 11201

February 15, 2012

## **VIA ECF AND MAIL**

Susan R. Necheles, Esq. 500 Fifth Avenue 29th Floor New York, NY 10110 Russell M. Gioiella, Esq.

140 Broadway 38th Floor

New York, New York 10005

Re: United States v. Pedro Espada Jr., et al.

Criminal Docket No. 10-985 (FB)

## Dear Counsel:

We write to inform you that the Section 3500 material we have provided to you to date, and will continue to provide to you going forward, is intended to satisfy the government's obligations pursuant to <u>Brady</u> and <u>Giglio</u>.

In addition, please find enclosed a disc containing the following:

- (1) Additional exhibits which have been marked as follows: (a) GX 59 (additional Amex records, bates-stamped C125071-80, 171065-68, 171111-23, 1711058-62, 171124-44, C171097-98, 171110); (b) GX 257 (photos of Soundview, and Satellite locations) An updated, draft exhibit list; (c) GX 60 (death certificate); and (d) GX 282-a (bid proposal Safety Building 10/2/07).
- (2) Additional § 3500 material which has been marked as follows: (a) JC-4; (b) JMC-1; (c) EM-1 through EM-4; (d) EV-27; and (e) WW-3.

Very truly yours,

LORETTA E. LYNCH United States Attorney

By: /s

Carolyn Pokorny

Assistant U.S. Attorney

Clerk of the Court (FB)(w/o enclosures)